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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

United States of America,  
Plaintiff,  
v.  
Nikoli Adrian Almeida,  
Defendant.

Case No. 2:24-mj-00131-MDC-1  
**Stipulation and Proposed Order**

Mr. Almeida was charged by criminal information on February 8, 2024, with three counts: **(1)** Operating a Motor Vehicle while Under the Influence of Alcohol (a violation of 36 C.F.R. § 4.23(a)(1)); **(2)** Operating a Motor Vehicle with a BAC of 0.08 Grams and Higher (a violation of 36 C.F.R. § 4.23(a)(2)); **(3)** Speeding (a violation of 36 C.F.R. § 4.21(c)). (ECF No. 1.)

Mr. Almeida entered a plea agreement. (ECF No. 10.) Under that agreement, Mr. Almeida pleaded guilty to Count One. (ECF No. 10.) Counts Two and Three were dismissed. (*Id.*) Mr. Almeida was sentenced on Count One as follows:

One-year term of Unsupervised Probation with special conditions:

1. \$500.00 Fine and \$10.00 Mandatory Penalty  
Assessment;
2. Attend/ Complete the Lower Court Counseling's  
DUI Course and Victim Impact Panel;
3. Attend/ Complete an Eight (8) hour online alcohol  
awareness course;
4. The Defendant not return to Lake Mead National  
Recreation Area for a period of one (1) year; and
5. Defendant must not violate any local, state, or  
federal laws.

Should Defendant complete conditions 1, 2, 3, and 4 of unsupervised probation within one (1) year, and has not violated any local, state, or federal laws during that time, the parties agree to jointly move to allow the Defendant to withdraw his guilty plea to Count One. Government will move to amend Count One to a charge of Reckless Driving. The parties will jointly request that the original sentence be applied to the Reckless Driving conviction.

(*Id.*)

Mr. Almeida has completed the special conditions of his unsupervised probation in accordance with his plea agreement and sentence. Accordingly, the parties agree that Count One should be amended to Reckless Driving.

Dated: July 8, 2025

Respectfully submitted,

Rene L. Valladares  
Federal Public Defender

/s/ Martin A. Novillo  
Martin A. Novillo  
Assistant Federal Public Defender

Sigal Chatnah  
United States Attorney

/s/ Skyler H. Pearson  
Skyler H. Pearson  
Assistant United States Attorney

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

United States of America,

Plaintiff,

V.

Nikoli Adrian Almeida,

Defendant.

Case No. 2:24-mj-00131-MDC-1

## [Proposed] Order

The Court finds that Mr. Almeida has completed the special conditions of his unsupervised probation in accordance with his plea agreement and sentence.

IT IS THEREFORE ORDERED that Mr. Almeida is permitted to withdraw his guilty plea to Count One: Operating a Motor Vehicle Under the Influence.

IT IS FURTHER ORDERED that the Court, consistent with the plea agreement and sentence, enters a plea of guilty to Amended Count One: Reckless Driving.

DATED: 7-11-25

UNITED STATES MAGISTRATE JUDGE